

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Michael H. Williamson, et al.,	:	
	:	
Plaintiffs,	:	Case No. C2-06-292
	:	
v.	:	Judge Marbley
	:	
Recovery Limited Partnership, et al.,	:	Magistrate Judge Kemp
	:	
Defendants.	:	

The Dispatch Printing Company, et al.,	:	
	:	
Plaintiffs,	:	Case No. C2-06-292
	:	
v.	:	Judge Marbley
	:	
Recovery Limited Partnership, et al.,	:	Magistrate Judge Kemp
	:	
Defendants.	:	

The Dispatch Printing Company, et al.,	:	
	:	
Plaintiffs,	:	Case No. C2-06-292
	:	
v.	:	Judge Marbley
	:	
Gilman D. Kirk, et al.,	:	Magistrate Judge Kemp
	:	
Defendants.	:	

AFFIDAVIT OF WILLIAM M. MATTES

I, William M. Mattes, after first being duly sworn and cautioned, hereby state as follows
based on my personal knowledge:

1. I am a partner in the law firm of Dinsmore & Shohl, LLP ("Dinsmore"). Defendants Gilman Kirk, James Turner, W. Arthur Cullman, Jr., Michael Ford and Tommy Thompson (collectively "Clients") were all covered by an insurance policy in the above-captioned lawsuit in their roles as Offices and Directors of Columbus Exploration LLC.

2. I submit this affidavit in support of a Motion to Withdraw as Counsel for the Clients, based on my own personal knowledge.

3. The insurance coverage that was used throughout most of this litigation has been fully exhausted.

4. The Clients have been informed by their insurer and Dinsmore of the fact that insurance coverage has been exhausted and of their need to make arrangements to engage counsel and pay for past services and agree to pay for future services.

5. Despite being informed that they would need to do so, the Clients have failed to make arrangements to engage Dinsmore and failed to make arrangements to pay for past and agree to pay for future legal services.

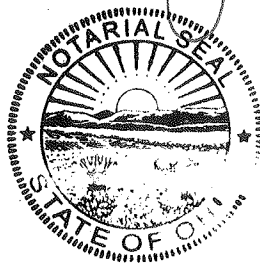


William M. Mattes

Sworn to and subscribed before me this 16th day of March, 2015.



NOTARY PUBLIC



Mary Lou Henry
Notary Public, State of Ohio
Expires 12-20-2017

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